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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL
CLEANUP

JUN 2 5 2015

Mr. Miles Dyer
Acting Director, Environmental Compliance
Senior Staff Environmental Engineer
Jorgensen Forge Corporation
8531 E. Marginal Way S
Tukwila, Washington 98108

Mr. Will Ernst
EO&T EHS Remediation
The Boeing Company
PO Box 3707 M/C 1W-12
Seattle, Washington 98124

Re: US EPA Comments – Proposed Decontamination Standards and Objectives, Jorgensen Forge Outfall Cleanup, Lower Duwamish Waterway Superfund Site, Seattle, WA

Dear Mr. Dyer and Mr. Ernst:

The US Environmental Protection Agency has reviewed the Proposed Decontamination Standards and Objectives for the Jorgensen Forge Outfall Cleanup, part of the Lower Duwamish Waterway Superfund Site, Seattle WA. Comments on the document are below. The EPA expects a revised document addressing the comments below to be resubmitted to the EPA as part of the first draft of the Corrugated Metal Pipe Work Plan.

1) In place of the Visual Standard No. 2 at 40 CFR 761.79(b)(3)(i)(B), use the standard which was established for Boeing Plant 2, which reads as follows "Non-disposable equipment and structures must be decontaminated using mechanical means or pressure washing to achieve a "clean debris surface" as defined in 40 C.F.R. § 268.45, Table 1, footnote 3."EPA also required that Boeing "… ensure that any decontamination conducted pursuant to this approval will be conducted in compliance with the requirements of 40 C.F.R. 761.79(e)-(g)."EPA established this requirement under the authority of 761.61(c), since the decontamination activities are integral to the overall cleanup under 761.61(c). All decontamination wastes must be disposed of pursuant to 40 CFR 761.79(g).This section says that that decon wastes are to be disposed of at their existing, or as-generated concentration.

2) The EPA concurs with the proposal to construct a decontamination cell. The EPA is further requiring that the Respondents expand this concept to accommodate decon of all reusable equipment associated with this project.

3) There needs to be a specification of what constitutes "heavy-duty geomembrane." EPA is allowing a 20-mil thickness, provided that the respondents put a layer of sand between the

concrete and the membrane to protect the synthetic material from puncture. Even with careful sweeping, it is entirely possible there could be something left that could puncture the geomembrane.

4) Ecology blocks need to outline the decon area, followed by liners placed interior to the blocks, using the blocks as anchor points for the liner.

5) With regards to "solid and liquid wastes", some of these, such as pumps, hoses and vacuums seem more like reusable equipment that can be deconned, not solid wastes to be disposed of. Make this change.

6) The CAPSUR solvent system, is not a hydrocarbon solvent. This is fine for PCBs, but EPA has concerns that the product may not do much to get the creosote itself off of the sheet piles. An additional solvent, applied after the CAPSUR solvent, may be needed to get the creosote off.

A revised Decontamination Standards and Objectives Memo needs to be submitted as an appendix to the Corrugated Metal Pipe Work Plan due within 45 days from signature of the settlement agreement.

Should you have any questions, I can be reached at 206 553 4092 or sanga.ravi@epa.gov. Inquiries of a legal nature may be directed to Richard Mednick @ 206 553-1797 or mednick.richard@epa.gov.

Sincerely,

Ravi Sanga
Remedial Project Manager
Site Cleanup Unit 3
Office of Environmental Cleanup

cc:

Dee Gardner
Sound Earth Strategies, Inc.

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Ecology